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as Trustee for GSAMP TRUST 2007-HSBC1 Mortgage
Pass-Through Certificates, Series 2007-HSBC1*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ONORIO RAMOS,

Plaintiff,

V.

SABLES, LLC, a Nevada limited liability company; WILMINGTON FINANCE, INC., a Delaware corporation; DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR GSAMP TRUST 2007-HSBC1 MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-HSBC1; DOES I through X and ROE BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No.: 2:25-cv-00776-APG-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

[SECOND REQUEST]

Plaintiff Onorio Ramos (**Ramos**) and Defendants Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST 2007-HSBC1 Mortgage Pass-Through Certificates, Series 2007-HSBC1 (**Deutsche Bank**) and Wilmington Finance, Inc. (**Wilmington**), by and through their respective counsel of record, respectfully stipulate to a ninety (90) day extension of the discovery and scheduling order deadlines. This is the parties' second request for an extension of the deadlines identified in this stipulation.

1 **I. Introduction:** This dispute arises out plaintiff Onorio Ramos's complaint concerning
2 the real property located at 4305 Puebla Street, Las Vegas, NV 89115. Ramos raises claims for: quiet
3 title, declaratory judgment, injunctive relief, violation of TILA, breach of contract and/or breach of
4 the implied covenant of good faith and fair dealing, fraud/conspiracy, violation of NRS 107.028, and
5 violation of NRS 107.200 et seq. *See* Am. Compl., ECF No. 32. Ramos seeks a declaration that the
6 first-position deed of trust recorded against the property has been extinguished, as well as monetary
7 damages. Deutsche Bank contends its deed of trust remains a valid encumbrance on the property, and
8 Defendants dispute that Ramos is entitled to any relief. All of the parties are now in agreement to
9 extend the discovery schedule.

10 **II. Statement Specifying the Discovery Completed:**

11 On October 24, 2025, the court entered an amended stipulated discovery plan and scheduling
12 order [ECF No. 57], setting the following deadlines:

13 (a) Discovery Deadline: January 20, 2026
14 (b) Initial Expert Disclosure Deadline: November 18, 2025.
15 (c) Rebuttal Expert Disclosure Deadline: December 18, 2025.
16 (d) Dispositive Motion Deadline: February 19, 2026.
17 (e) Pre-trial Order Deadline: March 20, 2026, or 30 days after an order is entered on any
18 dispositive motion filed.

19 The following discovery has been **completed**:

20 1. Deutsche Bank served its initial disclosures on June 27, 2025.
21 2. Deutsche Bank served its Notice of Subpoena Duces Tecum to Clark County
22 Treasurer on December 23, 2025.
23 3. Deutsche Bank served its Notice of Subpoena Duces Tecum to Tax Accessor's Office
24 on December 23, 2025.
25 4. Deutsche Bank served its First Set of Requests for Admissions on plaintiff on
26 December 23, 2025.
27 5. Deutsche Bank served its First Set of Requests for Production on plaintiff on
28 December 23, 2025.

1 6. Deutsche Bank served its First Set of Interrogatories on plaintiff on December 23,
2 2025.

3 7. Deutsche Bank served its first supplement to its initial disclosures on December 23,
4 2025.

5 The following discovery remains **outstanding**:

- 6 1. Ramos and Wilmington to serve their initial disclosures.
- 7 2. All parties to serve written discovery and/or follow-up written discovery and
8 responses to the same.
- 9 3. Responses to Deutsche Bank's third-party subpoenas.
- 10 4. Scheduling of depositions.

11 **III. Reason Why Extension is Required / Good Cause.**

12 The parties are requesting a ninety (90) day extension of the discovery cutoff and related
13 scheduling order deadlines. Good cause supports the requested extension for several reasons. As
14 before, Ramos recently amended his complaint in August 2025 to add additional claims and a new
15 party (Wilmington) to the action, which has affected the timing and scope of remaining discovery to
16 complete. Both Ramos and Wilmington still need to serve their initial disclosures. The parties
17 previously agreed this would be completed no later than November 5, 2025, but the disclosures remain
18 outstanding. Deutsche Bank is coordinating with the other parties on service in an attempt to timely
19 resolve this issue without the need to burden the Court with motion practice. In the interim, Deutsche
20 Bank has recently served several third-party subpoenas, as well as written discovery on plaintiff.
21 These matters remain outstanding and additional time is required for Deutsche Bank to receive
22 responses and serve any follow-up discovery as needed, as well as schedule depositions. In addition,
23 both Deutsche Bank and Wilmington have only recently responded to the amended complaint, filing
24 motions to dismiss in September 2025. Wilmington's motion is now fully briefed as of December 5,
25 2025. Deutsche Bank has until January 9, 2026 to file the reply supporting its motion. The briefing
26 schedule on these motions have been extended for various reasons, not least of which family health
27 matters on the part of Ramos's counsel, the recent illness of Deutsche Bank's counsel, and office
28 closures due to the holidays. For the same reasons, the parties require additional time to complete

1 discovery, in particular as it pertains to scheduling the parties' depositions once responses to Deutsche
 2 Bank's written discovery and subpoenas are obtained. In order to facilitate the completion of
 3 discovery, the parties therefore respectfully request a ninety (90) day extension to the current
 4 deadlines.

5 **IV. Proposed Schedule for Completing All Remaining Discovery:**

6 The parties agree to extend discovery by ninety (90) days, and request the court enter the
 7 following order extending discovery as follows:

- 8 (a) Discovery Cut Off: **Monday, April 20, 2026**
- 9 (b) Initial Expert Disclosure Deadline: **no extension requested**
- 10 (c) Rebuttal Expert Disclosure Deadline: **no extension requested**
- 11 (d) Dispositive motions: **Wednesday, May 20, 2026**
- 12 (e) Pre-Trial Order: **Friday, June 19, 2026.**

13 This stipulation is made in good faith and not for the purpose of delay.

14 Dated: December 30, 2025.

<p>AKERMAN LLP</p> <hr/> <p>/s/ <i>Nicholas E. Belay</i></p> <p>SCOTT R. LACHMAN, ESQ. Nevada Bar No. 15175 NICHOLAS E. BELAY, ESQ. Nevada Bar No. 15175 AKERMAN LLP 1180 N. Town Center Dr., Suite 290 Las Vegas, NV 89144</p> <p><i>Attorneys for Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST 2007-HSBC1 Mortgage Pass-Through Certificates, Series 2007-HSBC1</i></p>	<p>HONG & HONG LAW OFFICE</p> <hr/> <p>/s/ <i>Joseph y. Hong</i></p> <p>JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 festival Plaza Dr., Suite 650 Las Vegas, Nevada 89135</p> <p><i>Attorney for Onorio Ramos</i></p>
<p>GREENBERG TAURIG, LLP</p> <hr/> <p>/s/ <i>Joel E. Tasca</i></p> <p>JOEL EDWARD TASCA, ESQ. Nevada Bar No. 14124 10845 Griffith Peak Dr., Suite 600 Las Vegas, Nevada 89135</p> <p><i>Attorneys for Wilmington Finance, Inc.</i></p>	<p>IT IS SO ORDERED</p> <p>DATED: 10:06 am, January 07, 2026</p> <p></p> <p>BRENDA WEKSLER UNITED STATES MAGISTRATE JUDGE</p>